



NEW YORK CITY HOUSING AUTHORITY
LAW DEPARTMENT
250 BROADWAY • NEW YORK, NY 10007
<http://nyc.gov/nycha>

STANLEY BREZENOFF
Interim Chair & CEO

WRITER'S DIRECT LINE
212-776-5043

January 22, 2019

VIA ECF

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: Gina Williams v. New York City Housing Authority et al.
18 CV 5912 (JGK)**

Dear Judge Koeltl:

I am an attorney with the New York City Housing Authority ("NYCHA") Law Department, and I represent Defendants NYCHA, Carolyn Jasper, Cesar Gonzalez, Matthew Hoffman, Rodney Davis, and Thelma Watkins (collectively "Defendants") in the above-referenced matter. I write jointly with *pro se* Plaintiff Gina Williams ("Plaintiff") to respectfully request an adjournment of the deadline for completion of fact discovery, which is currently scheduled to close on February 5, 2019. This is the parties' first request for an adjournment.

Thus far, the parties have engaged in written discovery. Plaintiff has outstanding her Initial Discovery as required by this Court's Initial Discovery Protocols; a response to Defendants' First Set of Interrogatories, dated November 2, 2018; and a response to Defendants' December 31, 2018 deficiency letter regarding her response to Defendants' First Set of Demands for Discovery and Inspection. Defendants have no outstanding written responses. Neither party has conducted depositions.

The parties respectfully request that the deadline for completion of factual discovery be adjourned to May 15, 2019. The parties also request that the pre-motion letter to be submitted to the Court by February 28, 2019 be adjourned to June 14, 2019 and that the post-discovery conference scheduled for March 22, 2019 be adjourned to a date after June 14, 2019 at the Court's convenience. *See* Docket No. 20 (Case Management Plan and Scheduling Order, dated Oct. 5, 2018).

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The parties thank the Court for its consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'NR' or 'Nabiha Rahman'.

Nabiha Rahman

cc: Gina Williams (via Electronic & First-Class Mail)
146-17 182nd Street
Springfield Gardens, NY 11413
(347) 886-7802
ginawms@verizon.net